

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SAMANTHA CAREY)
)
Plaintiff,)
)
) CIVIL ACTION
v.) FILE NO. 1:11-cv-01782-SCJ -AJB
)
HANNAH, KENDRIX, ZACHARY &)
ASSOCIATES, LLC AND SUSAN)
ARLENE ZACHARY)
)
Defendants.)
)

REQUEST FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff hereby requests for the entry of default judgment against Defendants, Hannah, Kendrix, Zachary & Associates, LLC and Susan Arlene Zachary. Defendant Hannah, Kendrix, Zachary & Associates, LLC was served with Plaintiff's Complaint on June 8, 2011. *See Exhibit A.* Defendant Susan Arlene Zachary was served via personal service on June 8, 2011. *See Exhibit B.* Defendants have offered no explanation for their failure to answer the instant complaint. Accordingly, Plaintiff seeks default against Defendants in the amount of three thousand four dollars and ninety-five cents (\$3,004.95), representing statutory damages in the amount of one thousand dollars (\$1,000.00), 15 U.S.C.

§1692(k)(a)(2)(A), one thousand five hundred dollars (\$1,500.00) in attorney fees¹ and five hundred four dollars and ninety-five cents (\$504.95) for court costs. This sum is supported by the Affidavit of undersigned, attached hereto as Exhibit C.

This 15th day of July, 2011.

ATTORNEYS FOR PLAINTIFF
SAMANTHA CAREY

Respectfully submitted,

/s/ Craig J. Ehrlich
Craig J. Ehrlich
Georgia Bar No. 242240
WEISBERG & MEYERS, LLC
5025 N. Central Ave. #602
Phoenix, AZ 85012
(888) 595-9111 ext. 250
(866) 842-3303 (fax)
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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Time New Roman and a point size of 14.

Respectfully submitted,

/s/ Craig J. Ehrlich
Craig J. Ehrlich

¹ Plaintiff has incurred in excess of \$2,500 in attorney fees to date.

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Filed electronically on this 15th day of July, 2011, with:

United States District Court CM/ECF system

Copy of the foregoing was mailed on this 15th day of July, 2011 to:

Hannah, Kendrix, Zachary & Associates, LLC
c/o Susan Arlene Zachary
145 Opal CT.
Fayetteville, GA 30215

s/Tremain Davis

Tremain Davis